



PATRICK+McGAHAN

+ Via ECF +

February 28, 2022

The Honorable Hildy Bowbeer
United States District Court
316 N. Robert Street
St. Paul, MN 55101

Re: *In re Cattle and Beef Antitrust Litigation*,
Case No. 0:20-cv-01319-JRT-HB

Dear Magistrate Judge Bowbeer:

As foreshadowed in my letter to Chambers on February 11, 2022 (ECF No. 359), the parties submit this letter to update the Court as to the status of their negotiations regarding reasonable queries against structured data.

Plaintiffs sent each Defendant group letters on February 14, 2021, raising questions as to: a) the types of structured data Defendants possess; and b) the structured data that had been the subject of Defendants' prior disclosures. Plaintiffs had previously provided Defendants with details regarding the scope and purpose of certain of their structured data requests by letter, dated January 27, 2022.

After receiving Plaintiffs' January 27 letter to all Defendants, the parties held a productive meet and confer on February 9 regarding questions common to structured data for all Defendants. Plaintiffs then previewed that they would follow up on their previous letter with Defendant-specific questions. Defendants have been working diligently to respond to Plaintiffs' detailed Defendant-specific letters, received the evening of February 14, and intend to respond by the week of March 14, 2022.

The parties propose to meet and confer further once Plaintiffs are in receipt of those letters and update the Court regarding their progress in the update letters, due on March 30, 2022, ahead of the April 1, 2022 CMC. ECF No. 295. Currently, there is no issue requiring the Court's intervention.

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The parties are available to answer any further questions the Court may have.

Sincerely,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

A handwritten signature in blue ink, appearing to read 'PM-a', with a long horizontal flourish extending to the right.

Patrick McGahan

Cc: Counsel of Record